REMARKS/ARGUMENTS

Claims 1 and 3-28 are pending in this application. Claims 1 and 3-21 stand rejected

under 35 U.S.C. 103(a) as being unpatentable over United States Patent No. 5,857,212 issued to

Van De Vanter, and United States Patent No. 5,627,948 issued to *Funkunaga*. Claims 22, 27 and

28 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Multi-Edit Text Editor

Version 8.0 ("Multi-Edit"). Claims 23-26 stand rejected under 35 U.S.C. 103(a) as being

unpatentable over Multi-Edit in view of WordPerfect For Windows Version 6.1

("WordPerfect"). Applicant respectfully requests that the rejections be reconsidered in light of

the arguments presented below.

Rejection of Claims 22, 27 and 28

The Office Action rejects Claims 22, 27 and 28 under 35 U.S.C. 103(a) as being

unpatentable over Multi-Edit. In particular, the Office Action argues that the restrict cursor

option taught by Multi-Edit for triggering an insertion point in a document anticipates Claims 22,

27 and 28. Applicant respectfully disagrees and submits that the procedure described in the

Office Action is significantly different from the methods of Claims 22, 27 and 28. Moreover, the

procedure described in the Office Action fails to teach the elements recited in the claims.

Independent Claim 22 is directed to a computer-implemented method for editing an

electronic document that comprises "receiving a notification of an intent to create an insertion

point at a cursor location in the electronic document; and if the cursor location corresponds to no

existing text, automatically making formatting adjustments sufficient to create the insertion point

at the cursor location."

The Office Action includes screenshots to illustrate that Multi-Edit anticipates independent Claim 22. In particular, page 3 illustrates a restrict cursor option. The cursor becomes unrestricted when a user unchecks the option. According to the screenshots, an unrestricted cursor allows a user to position the cursor beyond the end of file indicator to enter text. The end of file indicator is then positioned just after the addition of the new text. Multi-Edit does not teach anything about creating an insertion point at a cursor location within a document where no text exists.

The Multi-Edit procedure is limited to creating an insertion point beyond an end of the file indicator and adding text at the insertion point. Thus, the Multi-Edit procedure does not teach creating an insertion point at a location in the electronic document where no text exists. Applicant respectfully submits that the method in Claim 22 is clearly different from the Multi-Edit procedure described by the Office Action.

For the reasons stated above, Applicant respectfully submits that independent Claim 22 is not anticipated or rendered obvious by Multi-Edit and is allowable. Claims 27 and 28 depend from Claim 22 and, thus, are allowable for at least the same reasons.

Rejection of Claims 23-26

The Office Action rejects Claims 23-26 under 35 U.S.C. 103(a) as being unpatentable over Multi-Edit in view of WordPerfect. In particular, the Office Action argues that the formatting adjustments taught by WordPerfect anticipate Claims 23-26. Applicant respectfully disagrees and submits that the procedure described in the Office Action is significantly different

from the methods of Claims 23-26. Moreover, the procedure described in the Office Action fails to teach the elements recited in the claims.

Dependent Claims 23-26 are directed to formatting adjustments to create the insertion point at the cursor location in the document. Claim 23 teaches that "the formatting adjustments comprise adding paragraph marks sufficient to extend existing text to a vertical location proximate to the cursor location." Claims 24 and 25 each teach that "the formatting adjustments comprise characters, tabs, or spaces sufficient to extend existing text to a horizontal location proximate to the cursor location." Claim 26 teaches that the formatting adjustments include "identifying context information for existing text proximate to the cursor location and making formatting adjustments at the insertion point at the cursor location."

The Office Action includes screenshots to illustrate that Word Perfect anticipates dependent Claims 23-26. In particular, page 8 reveals that a bitmap image is added at a location beyond the end of a document and text is written within the bitmap image. Page 9 shows that no paragraph marks, characters, tabs, or spaces are added to the document for format adjusting. Page 10 does show a series of paragraph marks followed by a line of text but Applicant fails to understand how this screenshot is linked to the addition of a bitmap image as shown on pages 8 and 9.

For the reasons stated above, Applicant respectfully submits that dependent Claims 23-26 are not anticipated or rendered obvious by Multi-Edit, WordPerfect or any combination thereof and is allowable. Furthermore, Claims 23-26 depend from Claim 22 and, thus, are allowable for at least the same reasons.

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Rejections of Claims 1 and 3-21

The Office Action maintains the rejections of Claims 1 and 3-21 from the Office Action dated December 11, 2001. The claims were rejected under 35 U.S.C. 103(a) as being unpatentable over *Van De Vanter* and *Funkunaga*. Applicant respectfully disagrees and presents additional arguments in addition to the arguments presented in the Response to the Office Action filed on April 11, 2002.

Regarding independent Claim 1, *Van De Vanter* does not teach "collecting context information regarding the location of the cursor in the electronic document," as recited in Step (b). *Van De Vanter* also fails to teach "changing a presentation of the cursor to indicate an anticipated location of the insertion point and **the type of formatting that will be applied to text and objects located in close proximity to the cursor location**." *Van De Vanter* appears to teach changing the presentation of the cursor from an arrow to an I-beam when the cursor is positioned over existing text. While the I-beam may indicate an anticipated location, it does not indicate "the type of formatting," as recited in Step (d). Moreover, Step (f) of Claim 1 recites "performing formatting to place the insertion point in the electronic document," which is not taught by *Van De Vanter* in any way.

Fukunaga fails to cure the insufficiencies of the *Van De Vanter* reference to render Applicant's claimed invention unpatentable. *Fukunaga* does not teach "collecting context information regarding the location of the cursor," "changing a presentation of the cursor," or "performing formatting to place the insertion point in the electronic document." Thus, *Fukunaga* does not teach Applicant's invention as claimed in Claim 1.

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For the reasons stated above, Applicant respectfully submits that independent Claim 1 is allowable over *Van De Vanter* and *Fukunaga*. Claims 3-9 depend on Claim 1 and are thus allowable for at least the reasons just stated.

Regarding independent Claims 10, 15, and 21, the Office Action applies arguments somewhat similar to those used to reject Claim 1. Thus, relevant remarks presented above in conjunction with Claim 1 also apply to Claims 10, 15, and 21. Additional arguments regarding the insufficiency of *Van De Vanter* and *Fukunaga* to render Applicant's claimed invention unpatentable are presented below.

Both Claims 10 and 15 recite "collecting context information regarding a location of the cursor…applying the collected context information to a database of a plurality of rules to determine whether the collected context information coincides with one of the plurality of rules." Neither *Van De Vanter* nor *Fukunaga* teach Applicant's invention as claimed in Claims 10 and 15. It appears that *Van De Vanter* teaches rules associated with separating two adjacent tokens. However, the rules in *Van De Vanter* are not associated with context information regarding cursor location. Also, *Van De Vanter* does not teach "determining one of a plurality of cursors associated with the coinciding rule; and displaying the associated cursor," as recited in Claim 10. *Van De Vanter* fails to teach "adjusting the location of the insertion point based upon the coinciding rule," as taught by Applicant's claim 15.

Accordingly, Applicant respectfully submits that independent Claims 10, 15 and 21 are allowable over *Van De Vanter* and *Fukunaga*. Dependent Claims 11-14 and 15-20 are thus allowable for at least the reasons just stated and those discussed in conjunction with Claim 1.

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CONCLUSION

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.
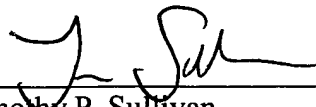
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Respectfully submitted,

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